



U.S. Department of Justice

United States Attorney  
Southern District of New York

The Jacob K. Javits Federal Building  
26 Federal Plaza, 37th Floor  
New York, New York 10278

April 21, 2025

**BY ECF**

The Honorable Victor Marrero  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

**Re:        *United States v. Patel et al., 25 Cr. 173 (VM)***

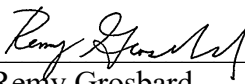
Dear Judge Marrero:

The Government respectfully writes to inform the Court that defendants Sunil Patel, Ratansha Vakil, and Lakhmichand Lohani are scheduled to be arraigned in Magistrate Court on May 1, 2025 at 11:00 a.m., and to request that an initial conference be scheduled before this Court on May 9, 2025 at 1:00 p.m.

The Government also requests that the time between today and the May 9 initial conference be excluded pursuant to the provisions of the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A). While it is the Government's position that the Speedy Trial clock does not begin to run until the date a defendant is arraigned, out of an abundance of caution, the Government seeks the proposed exclusion between today and the date of arraignment, in addition to between the arraignment and the May 9 initial conference. The Government respectfully submits that the ends of justice served by granting the proposed exclusion outweigh the best interests of the public and the defendants in a speedy trial, as the proposed exclusion will allow the Government time to assemble and produce discovery, the defendants time to review discovery, and the parties an opportunity to discuss the possibility of a pretrial resolution of this case. Defense counsel for each of the defendants has informed the Government they consent to this request.

Respectfully submitted,

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Acting United States Attorney

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cc (by ECF): Counsel of Record